

NO: 1:07-CV-616-MHT-SRW

Roger Reeves (Plaintiff)

RECEIVED

2008 FEB -7 A 9:26

DEBRA P. HACKETT, CL  
U.S. DISTRICT COURT  
MIDDLE DISTRICT ALA

DSI Security Services  
American Buildings, INC  
EEOC etc.

## MOTION TO STAY Taking of Deposition

Plaintiff Roger Reeves moves the court to stay taking of deposition on Plaintiff by DSI. Defendant seek information that is privileged, not relevant to the Claim; unreasonably duplicative, and will cause undue burden and expense on Plaintiff (Rule 26 (2C)). Rule 26 2(c) protect against disclosure of conclusion, opinions, or legal theories. Defendant seeks information that is highly opinionated, or Privilege conclusive. All other information and facts has been given Defendant. Rule 26 (5C) protect a party or person from annoyance, embarrassment, oppression, or undue burden or expense and that the discovery not be had. Defendant DSI ask for income TAX information which intrudes in personal unrelated information.

For This cause Plaintiff desires that  
Motion to STAY Taking of Deposition of Plaintiff  
be granted.

2/6/08 Roger Gerner

Certificate of Service

I hereby certify on FEB. 6, 2008 I filed  
with the Clerk of the Court and a Copy  
of this Document was mailed postage paid to:

Jackson Lewis LLP  
FIRST Commercial Bank Bldg.  
800 Shades Creek Parkway  
Suite 870  
Birmingham, ALA. 35209

Nelson Mullis Rife &  
SCARBOROUGH LLP  
999 Peachtree Street NE  
14th FLOOR  
ATLANTA, GA.

Donielle J. HAYOT  
U.S. Equal Employment Opportunity Commission  
Office of Legal Counsel  
1801 L Street N.W.  
Washington, D.C. 20507